



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-2

APR 12 1995

Joan M. Thomas, Treasurer
D.C. Democratic State Committee
715 Varnum Street, NW
Washington, DC 20011

Identification Number: C00295964

Reference: 30 Day Post-General Report (10/1/94-12/8/94)

Dear Ms. Thomas:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Line 6(a) of the Summary Page represents the total cash-on-hand as of January 1, 1994. This figure should be the same on all the reports covering the calendar year. Please amend your report to clarify the change made in Line 6(a).

-The total listed on Line 6(c), Column B of the Summary Page appears to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Line 6(c), Column B total.

-Please provide the Column B totals for the Detailed Summary Page.

-Your calculations for Line 31, Column A appear to be incorrect. FEC calculations disclose this amount to be \$26,655.88. Please provide the corrected total on the Detailed Summary Page.

-Schedule H3 for transfers from a non-federal account for joint activity discloses \$17,443.79 in transfers, however a breakdown of the transfers received has not been provided. Please amend your Schedule H3 accordingly.

- Your report fails to disclose the federal and non-federal shares of administrative expense payments.

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D.C. DEMOCRATIC STATE COMMITTEE
PAGE 2

A party committee must allocate between its federal and non-federal account all expenses for administrative costs, generic voter drives and fundraising programs or events. 11 CFR 106.6(b)(2)

Schedule H2 is used by all political committees to report the allocation ratios of their joint federal and non-federal fundraising events and direct candidate support programs. Schedule H2 is filed with each report that discloses a disbursement for a shared activity. Schedule H3 is used by all political committees to report transfers received by the federal account from the non-federal account(s) to pay the non-federal share of allocable expenses.

Any expenditure made on behalf of both federal and non-federal candidates (including in-kind contributions) must also be allocated between your committee's federal and non-federal accounts. Schedule H4 is used by all political committees to report payments for allocable expenses. 11 CFR 106.1(a)

Please clarify the procedures you are currently using to allocate shared activity. The Commission recommends that you take steps to correct any non-compliance with the regulations. Also, your committee should establish procedures to ensure future compliance with the allocation regulations.

-Schedule H3 of your report discloses \$17,443.79 in transfers from your non-federal account for joint activity, however you have not filed a Schedule H4 disclosing the federal and non-federal shares of the allocable activity.

Further, Schedule B, supporting Line 29 indicates your federal account has paid 100% of the allocable expenses. This indicates a possible impermissible transfer of funds from your non-federal account to your federal account. You are advised that 11 CFR 102.5 prohibits a non-federal account from financing activity in connection with federal elections. Please provide clarifying information regarding these transactions including the date(s) when the original activity was conducted by the non-federal account. In addition, if any of the disbursements disclosed on Schedule B supporting Line 29 were made to influence the election

D.C. DEMOCRATIC STATE COMMITTEE
PAGE 3

or defeat of specific federal candidates, the disbursements should be allocated accordingly and disclosed as in-kind contributions on Schedule B supporting Line 23. 11 CFR 104.3(b)(3)

Although the Commission may initiate legal action regarding the activities conducted by your non-federal account, any clarifying information that you can provide will be taken into consideration.

-Schedule F of your report discloses \$5,000 in coordinated party expenditures. Please be advised that your committee is qualified to make coordinated party expenditures only on behalf of federal candidates in the District of Columbia. All other expenditures should be disclosed as in-kind contributions on Schedule B supporting Line 23.

Further, Schedule F disclosed coordinated party expenditures made directly to a candidate committee (pertinent portions attached). Please be advised that a coordinated expenditure is to be made on behalf of a candidate for the General Election. The money cannot be contributed directly to the candidate committee. Please amend your report to clarify your expenditures and record them on the appropriate schedule supporting the correct line of the Detailed Summary Page.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,



Reports Analyst
Reports Analysis Division

SCHEDULE F

**ITEMIZED COORDINATED EXPENDITURES MADE BY
POLITICAL PARTY COMMITTEES OR DESIGNATED AGENTS(S)
ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE
(2 U.S.C. §441a(d))**

Page 1 of 3
LINE NUMBER _____

(To be used only by Political Committees in the General Election)

| Name of Political Committee (in full) DC Democratic State Committee | | | | |
|---|--|------------------------------|-------------------------|---------------|
| Has your Committee been designated to make coordinated expenditures by a political party committee? If YES, name the designating committee: YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> | | | | |
| Full Name, Mailing Address and ZIP Code of Designated Committee DC Democratic State Committee 715 Vermont St NW Wash. DC 20011 | | | | |
| Full Name, Mailing Address and ZIP Code of Each Payee | Name of Federal Candidate Supported, State, District & Office Sought | Purpose of Expenditure | Date (month, day, year) | Amount |
| Dave Nader PO Box 792 Waterloo Iowa 57040 | Congress | Campaign Contribution | 10/14/94 | 500.00 |
| Aggregate General Election Expenditure for this Candidate—\$ | | | | |
| Full Name, Mailing Address and ZIP Code of Each Payee | Name of Federal Candidate Supported, State, District & Office Sought | Purpose of Expenditure | Date (month, day, year) | Amount |
| Jocine Blauvelt 1751 East Ave Cortez NY 4610 | 28th Dist of New York Congress | Campaign Contribution | 10/12/94 | 500.00 |
| Aggregate General Election Expenditure for this Candidate—\$ | | | | |
| Full Name, Mailing Address and ZIP Code of Each Payee | Name of Federal Candidate Supported, State, District & Office Sought | Purpose of Expenditure | Date (month, day, year) | Amount |
| Dawn Hoffman PO Box 1818 Bozrah Conn 06339 | Judd Smith of Conn Congress | Campaign Contribution | 10/12/94 | 500.00 |
| Aggregate General Election Expenditure for this Candidate—\$ | | | | |
| Full Name, Mailing Address and ZIP Code of Each Payee | Name of Federal Candidate Supported, State, District & Office Sought | Purpose of Expenditure | Date (month, day, year) | Amount |
| Ben Jones PO Box 671956 Marionetta La. 30067 | 10th Dist of Georgia | Campaign Contribution | 10/17/94 | 500.00 |
| Aggregate General Election Expenditure for this Candidate—\$ | | | | |
| SUBTOTAL of Expenditures This Page (optional) | | | | |
| TOTAL This Period (last page this line number only) | | | | |

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SCHEDULE F

**ITEMIZED COORDINATED EXPENDITURES MADE BY
POLITICAL PARTY COMMITTEES OR DESIGNATED AGENTS(S)
ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE
(2 U.S.C. §441a(d))**

Page 2 of 3
Line Number _____

(To be used only by Political Committees in the General Election)

| Name of Political Committee (in Full) | | | | |
|---|--|------------------------|-------------------------|--------|
| DC Democratic State Committee | | | | |
| Has your Committee been designated to make coordinated expenditures by a political party committee? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO | | | | |
| If YES, name the designating committee: | | | | |
| Full Name, Mailing Address and ZIP Code of Subordinate Committee: | | | | |
| | | | | |
| Full Name, Mailing Address and ZIP Code of Each Payee | Name of Federal Candidate Supported, State, District & Office Sought | Purpose of Expenditure | Date (month, day, year) | Amount |
| Julian Dixon 1581 Roxbury Dr Los Angeles Calif 90035 | 32nd Dist. | Campaign Contribution | 10/12/94 | 500.00 |
| Aggregate General Election Expenditure for this Candidate—\$ | | | | |
| Full Name, Mailing Address and ZIP Code of Each Payee | Name of Federal Candidate Supported, State, District & Office Sought | Purpose of Expenditure | Date (month, day, year) | Amount |
| Rebecca Hepburn 1435 Watson Rd 107 St Louis, Mo 63114 | 3rd Dist Congress | Campaign Contribution | 10/12/94 | 500.00 |
| Aggregate General Election Expenditure for this Candidate—\$ | | | | |
| Full Name, Mailing Address and ZIP Code of Each Payee | Name of Federal Candidate Supported, State, District & Office Sought | Purpose of Expenditure | Date (month, day, year) | Amount |
| Diane Friedman 221 Courthouse Suite 310 Los Angeles Calif | Calif Senate | Campaign Contribution | 10/12/94 | 500.00 |
| Aggregate General Election Expenditure for this Candidate—\$ | | | | |
| Full Name, Mailing Address and ZIP Code of Each Payee | Name of Federal Candidate Supported, State, District & Office Sought | Purpose of Expenditure | Date (month, day, year) | Amount |
| Tom Folger 4750 N. Wilcox Rd Room 181 Spokane Washington | 3rd Dist Congress | Campaign Contribution | 10/12/94 | 500.00 |
| Aggregate General Election Expenditure for this Candidate—\$ | | | | |
| SUBTOTAL of Expenditures This Page (optional) | | | | |
| TOTAL This Period (last page this line number only) | | | | |

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SCHEDULE F

**ITEMIZED COORDINATED EXPENDITURES MADE BY
POLITICAL PARTY COMMITTEES OR DESIGNATED AGENTS(S)
ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE
(2 U.S.C. §441a(d))**

 Page 3 of 3
 LINE NUMBER

(To be used only by Political Committees in the General Election)

| | | | | |
|--|--|------------------------|-------------------------|--------|
| Name of Political Committee (in Full) | | | | |
| Has your Committee been designated to make coordinated expenditures by a political party committee? If YES, name the designating committee: <input type="checkbox"/> YES <input type="checkbox"/> NO | | | | |
| Full Name, Mailing Address and ZIP Code of Subordinate Committee | | | | |
| Full Name, Mailing Address and ZIP Code of Each Payee | Name of Federal Candidate Supported, State, District & Office Sought | Purpose of Expenditure | Date (month, day, year) | Amount |
| Mayone M. Murphy PO Box 157 Harberville, Pa 19072 | 13th Dist of Pa. | Campaign Contribution | 10/12/94 | 500.00 |
| Aggregate General Election Expenditure for this Candidate—\$ | | | | |
| Full Name, Mailing Address and ZIP Code of Each Payee | Name of Federal Candidate Supported, State, District & Office Sought | Purpose of Expenditure | Date (month, day, year) | Amount |
| Allen Wheat Kansas City Mo. | Mo. Senate | Campaign Contribution | 10/12/94 | 500 |
| Aggregate General Election Expenditure for this Candidate—\$ | | | | |
| Full Name, Mailing Address and ZIP Code of Each Payee | Name of Federal Candidate Supported, State, District & Office Sought | Purpose of Expenditure | Date (month, day, year) | Amount |
| | | | | |
| Aggregate General Election Expenditure for this Candidate—\$ | | | | |
| Full Name, Mailing Address and ZIP Code of Each Payee | Name of Federal Candidate Supported, State, District & Office Sought | Purpose of Expenditure | Date (month, day, year) | Amount |
| | | | | |
| Aggregate General Election Expenditure for this Candidate—\$ | | | | |
| SUBTOTAL of Expenditures This Page (optional) | | | | |
| TOTAL This Period (last page this line number only) | | | | |

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